

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

THEMBI DLAMINI

Plaintiff,

v.

JUNA G. BABB and MICHAEL J.  
BABB,

Defendants.

Civil Action File No.  
1:13-cv-02699-WSD

**PLAINTIFF’S PRE-TRIAL BRIEF REGARDING DAMAGES**

In accordance with the Court’s request at the pretrial conference held on April 22, 2015, Plaintiff Thembi Dlamini (“Plaintiff”) provides the following brief regarding the damages she intends to seek at trial:

Plaintiff no longer seeks to recover punitive damages from Defendants Juna G. Babb and Michael J. Babb (together, “Defendants”). Plaintiff is only seeking to recover pursuant to 18 U.S.C. § 1595, compensatory damages for lost compensation and emotional distress caused by Defendants’ violations of 18 U.S.C. §§ 1589 and 1590, as well as her reasonable attorneys’ fees.

Submitted this 23rd day of April, 2015.

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/s/ Audra A. Dial

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**CERTIFICATE OF SERVICE AND CERTIFICATE OF COMPLIANCE  
WITH LOCAL RULE 5.1**

I hereby certify that I electronically filed the foregoing **PLAINTIFF’S PRE-TRIAL BRIEF REGARDING DAMAGES** with the Clerk of Court using the CM/ECF system (which document was prepared in Times New Roman font, 14-point type, one of the font and point selections approved by the Court in N.D. Ga. L.R. 5.1(C)) and served a copy of same upon the Defendants (proceeding *pro se*) by depositing a true and correct copy thereof in the United States mail, first-class postage prepaid, addressed as follows:

Juna G. Babb  
4262 Ivy Run  
Ellenwood, Georgia 30294-6522

Michael J. Babb  
1335 Ethans Way  
McDonough, Georgia 30252

This 23rd day of April, 2015.

/s/ Audra A. Dial

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